

May 20, 2009

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Ms. Barbara J. Aldridge (6SF-TE)
Enforcement Officer, Superfund Division
U.S. EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

Re: Gulfco site and Confidential Business Information designation

Dear Ms. Aldridge:

This letter is designed to respond to your recent request for substantiation of Parker's confidential business information designation dated May 4, 2009. Your request related to two documents that you recently provided to Parker on or about May 8, 2009, a tax return filed by Hercules Marine Services Corporation and a memorandum detailing business strategy related to the bankruptcy of Hercules Marine Services Corporation. As your May 4, 2009 letter confirms, these documents were provided to Parker Drilling because its predecessor, Hercules Offshore Corporation, had a management agreement with Hercules Marine Services Corporation. Because the documents involve bankruptcy and tax issues, they are related to the management agreement between Hercules Offshore Corporation and Hercules Marine Services Corporation. Parker Drilling is not a successor to Hercules Marine Services Corporation.

Both of these documents involve sensitive corporate and financial information that should be protected as confidential business information. The successful assertion of a confidential business information designation depends on the following factors:

- 1) the business has asserted a business confidentiality claim that has not expired or been waived or withdrawn;
- 2) the business has satisfactorily shown that it has taken (and will continue to take) reasonable measures to protect the confidentiality of the information;
- 3) the information is not, and has not been, reasonably obtainable without the business's consent by other persons (other than governmental bodies) by use of legitimate means other than discovery based on a sharing of special need in a judicial or quasi-judicial proceeding;
- 4) no statute specifically requiring disclosure of the information, and

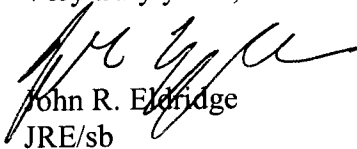
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- 5a) the business has satisfactorily shown that disclosure of the information is likely to cause substantial harm to the business's competitive position or
- 5b) the information was voluntarily submitted information and its disclosure would be likely to impair the Government's ability to obtain necessary information in the future.

Parker Drilling has met these tests. It has preserved its challenge and it has taken reasonable measures to protect the information. There is also no statute that compels the disclosure of this information. Because the information is tax and legal strategy information it would not be normally obtainable without the business's consent. Finally, this type of financial and corporate strategy information is by its nature sensitive and important to a business's competitive position. For these reasons, the documents at issue should be maintained as confidential business information.

Very truly yours,



John R. Eldridge
JRE/sb